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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR MOTION TO
EXCLUDE TESTIMONY AND OPINIONS
OF WAYMO'S DAMAGES EXPERT
MICHAEL WAGNER**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Administrative Motion to File Under
7 Seal Portions of their Motion to Exclude Testimony and Opinions of Waymo's Damages Expert
8 Michael Wagner ("Administrative Motion"). The Administrative Motion seeks an order sealing
9 highlighted portions of Defendants' Motion to Exclude Testimony and Opinions of Waymo's
10 Damages Expert Michael Wagner ("Defendants' Motion") and of Exhibits 4, 6-7, 10, 12-13, and 15 to
11 the Berry Declaration, as well as the entirety of Exhibits 1-3, 5, 8-9, 11, 14, 19, and 21-24 thereto.

12 3. Defendants' Motion (green highlighted portions), Exhibits 6 and 10 (green highlighted
13 portions), and Exhibits 1-3, 9, 19, and 21 (entire documents) contain, reference, and/or describe
14 Waymo's highly confidential and sensitive business information. Such information includes details
15 regarding internal Waymo communications about confidential business plans and strategy, including
16 confidential communications with third-parties, methods of evaluation and valuation of various
17 Waymo entities, and also valuation methods of multiple trade secrets. I understand that Waymo
18 maintains this information as confidential. The public disclosure of this information would cause
19 significant competitive harm to Waymo, as the knowledge would significantly aid Waymo's
20 competitors knowledge of Waymo's market positioning and evaluation.

21 4. In addition, Exhibits 1 and 21-22 (entire documents) contain, reference, and/or
22 describe Waymo's trade secret information, including as misappropriated by Defendants. The
23 information Waymo seeks to seal includes the confidential design and functionality of Waymo's
24 proprietary autonomous vehicle system, which Waymo maintains as secret. I understand that these
25 designs are maintained as secret by Waymo (Dkt. 25-47) and that the designs are valuable to
26 Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's
27 competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle
28

1 system. If such information were made public, I understand that Waymo's competitive standing
2 would be significantly harmed.

3 5. Waymo's request to seal is narrowly tailored to those portions of Defendants' Motion
4 and Exhibits 1-3, 6, 9-10, 19, and 21-22 that merit sealing.

5
6 I declare under penalty of perjury under the laws of the State of California and the United
7 States of America that the foregoing is true and correct, and that this declaration was executed in San
8 Francisco, California, on September 20, 2017.

9 By /s/ Felipe Corredor

10 Felipe Corredor

11 Attorneys for WAYMO LLC
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ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven